

EDI Discussion Document

Title: Change Control in the Deregulated Market

Findings of current practices of other utilities regarding development
of EDI standards and practices.

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Objective

The purpose of this document is to provide information sufficient to facilitate meaningful discussion re: developing a practice/policy to support a change control process that will be inclusive of EDI trading partners. Reasons for this research are:

1. Prevent downtime between when EDI development efforts are ready and when EDI trading partners are ready.
2. Gather intelligence regarding the external business environment (as it pertains to EDI documents and processes) and incorporate that knowledge into the systems design and development process.
3. Foster competition in Arizona's electricity deregulation business environment.

Research Methodology

Utilities and state regulators in the states of California, Pennsylvania and Massachusetts were approached and interviewed as to the practices within those states pertaining to change control and EDI. Three basic questions were covered:

1. What methods of communication are being used?
2. Which work (and why)?
3. Which do not work (and why)?

Results and Discussion

Utility Distribution Companies (UDCs) have been the primary drivers of EDI development in their respective deregulated environments. Initially, UDCs made use of two communications vehicles for discussions about EDI implementation:

1. E-Mail based List Serves, and,
2. UDC hosted ESP forums (informational and networking meetings).

As markets have moved toward state (and regional) EDI standards, an additional communication vehicle was incorporated into UDCs' modus operandi for discussing EDI plans and development. These are:

3. State level forums (informational, EDI working session and networking meetings).

E-Mail-Based List Serves

- Used in all states, though, not uniformly implemented. California has UDC-specific list serves. Pennsylvania has state-specific list serves. Massachusetts has both.
- UDC-specific list serves are used to disseminate information to ESPs that are operating in the UDC service area.
- State-specific list serves are used to disseminate information about state-level EDI development and schedules.

Comments re: e-mail based list serves:

1. In California, there are UDC specific list-serves to disseminate announcements re: forthcoming EDI changes (and, in my experience, to disseminate info about changes that already occurred but were not announced until the damage had been done). The audience for these list-serves, in California, are the people at the ESP's who are the main point of contact for UDC-ESP communications. Typically, what these contact people do with the notes is to re-distribute the notes to a wide range of folks internal to the ESP because there is often content that they have no comprehension of. Unfortunately, what happens with this model is that there are things that fall through the cracks because there is no one person that is responsible to see that all that is contained in the note is acted upon. However, from a UDC standpoint, the information was provided, and thus, there is no question re: the UDC being a responsible and informative citizen in the deregulated environment.
2. In California, each UDC maintains its own website with its own set of EDI implementation guidelines. There is some movement toward a state standard, but, such is not the case at this time.
3. In Pennsylvania, the list serve that serves the aforementioned monthly EDI meetings, serves also to keep all market participants informed of schedules, deadlines, plans, etc.. The PA list serves are open to all market participants, and, are considered the main vehicle for tracking and introducing change to EDI documents.

UDC-Hosted ESP Forums

- Used in California and Massachusetts.
- Used to disseminate information to ESPs that are operating in the UDC service area.

Comments re: UDC hosted ESP forums

1. California has UDC specific ESP "training and information sessions". A UDC (PG&E, for example) will have quarterly meetings to which all ESPs are invited and the ESP coordinators present information that includes, but is not limited to, discussion of EDI. These meetings will be held at the UDC offices, or, a hotel ballroom. For EDI specifically, plans and schedules are discussed, as well as, problems (solicited from the ESPs or problems that the UDC has uncovered) are discussed. ESP coordinators use these meetings to discuss issues one-on-one (during breaks, etc.) with their constituent ESPs, as well.
2. In Pennsylvania, there are no UDC hosted/UDC specific ESP training/information sessions. It is all managed on the state level.

State-Level Forums

- Used in California, Pennsylvania and Massachusetts. Pennsylvania uses this as their only communications medium for the discussion of EDI. California and Massachusetts use this to augment their UDC-based communications. Pennsylvania and Massachusetts (and eventually, California) use this to publish EDI information, including certification information.
- Used to involve any or all market participants in planning, development and scheduling of EDI related implementations.
- Used by individual market participants (i.e., UDCs and ESPs) to inform all other market participants of needs, changes and schedules.
- Oversight is provided by PUC's and PUC attendance is regular, but, technical discussions are driven by UDCs, and generally hosted by the UDCs on a rotating basis.

Comments re: state-level forums:

1. California state level EDI development/planning meetings are usually document specific. These meetings are generally hosted by UDCs, but, they are not necessarily UDC run, though, participation from other types of market entities (i.e. ESPs, MDMA's, etc.) is quite modest. The purpose of these meetings is to develop guidelines for the use of EDI in the state. California UDCs have struggled with the issue of creating uniform EDI implementation guides, and, these

- are the forums where this is being accomplished. UDCs and other entities will introduce needs for changes, or, represent their internal operations in these meetings in such a manner as to affect the guidelines that are produced (much as we have been doing with the 867 guides here in Arizona).
2. In California, there are also the State level Rule 22 meetings, where EDI is discussed only distantly, but, dates are set that impact the implementation schedules for EDI.
 3. In California, each UDC maintains its own website with its own set of EDI implementation guidelines. There is some movement toward a state standard, but, such is not the case at this time.
 4. In Pennsylvania, the market participates in a state hosted (though meetings often occur at UDC offices) forum for the development of EDI standards and guidelines. There is a greater willingness, on the part of all market participants, to evolve business processes in such a manner as to enable the creation of a single set of EDI guidelines that have a minimum of variations by UDC. The EDI guidelines for the State of Pennsylvania are maintained at one website, with variations (i.e., the use of ESP account number) noted on the single set of guidelines.
 5. In Pennsylvania, there are monthly working group meetings where all market participants meet to discuss their individual needs in light of the current EDI guides (or, in order to develop new EDI documents).
 6. In Pennsylvania, the list serve that serves the aforementioned monthly EDI meetings, serves also to keep all market participants informed of schedules, deadlines, plans, etc.. The PA list serves are open to all market participants, and, are considered the main vehicle for tracking and introducing change to EDI documents.
 7. Pennsylvania is developing a new website that will serve the needs of all UDCs as an information repository/distribution center in the state of PA, as well as other states in the region that intend to follow the PA model for implementing EDI and energy competition. Those additional states are, New Jersey, Delaware, Maryland and Virginia. New York may participate as well, but, will likely maintain a separate set of EDI guides (once developed).
 8. Massachusetts has an approach similar to Pennsylvania, but, what the ESP discovers is that each UDC is secretly harboring their own implementation guides that are discovered only when testing has begun. (It's true!)

Additional Comments

1. Nobody has produced a white paper on the subject.
2. All considered it in their interest to keep the ESPs fully informed (i.e., schedules, plans, development) and seek to include others at the earliest possible opportunity.
3. No system is without its critics.

Recommendations

1. Statewide forum for the planning, development and implementation of EDI document exchange guidelines.
2. Hosting of forums will be shared on a rotating basis.
3. Notes and minutes will be shared amongst meeting participants and others, if requested, and, easily accessible to all market and meeting participants.